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NAPA VALLEY UNIFIED SCHOOL DISTRICT, ANNIE PETRIE,
TROY MOTT, GERALD HARRIS and JESUS MARTINEZ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

B. DOE, a minor, by and through his Guardian,
KERRIE WAGNER,

Plaintiff,

v.

NAPA VALLEY UNIFIED SCHOOL
DISTRICT; ANNIE PETRIE; TROY MOTT;
GERALD HARRIS; JESUS MARTINEZ; J.T.;
D.O.; B.B.; J.Z.; R.J.; JOHN TORRES;
FLORA TORRES; and, DOES 1 through 100,
inclusive,

Defendants.

Case No. 3:17-cv-03753-SK

**STIPULATION TO CONTINUE INITIAL
DISCLOSURE DEADLINE**

Hon. Sallie Kim

IT IS HEREBY STIPULATED AND REQUESTED BY the parties to the above-captioned matter that the parties be permitted to serve and exchange Initial Disclosures two weeks beyond the October 20, 2017 deadline set by the Court in its Case Management Conference Minute Entry [Docket No. 40].

Due to the recent fires in the Napa area, the Napa Valley Unified School District has been closed since Monday (October 9, 2017), and is not scheduled to reopen until Monday, October 23, 2017, at the

earliest. This has greatly impaired counsel for the District's ability to contact its clients, obtain the necessary documents and information, and prepare them for disclosure.

The parties hereby stipulate and request that this Court permit the parties to exchange Initial Disclosures on or before November 3, 2017.

This two-week extension will not impact any other currently scheduled dates in this matter.

Dated: October 18, 2017

FLESHER SCHAFF & SCHROEDER

By: /s/ Jason Schaff
Jacob D. Flesher
Jason W. Schaff
Attorneys for Plaintiff
B. DOE

Dated: October 18, 2017

BERTRAND, FOX, ELLIOT, OSMAN & WENZEL

By: /s/ Ethan Lowry
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Ethan M. Lowry
Attorneys for Defendants
NAPA VALLEY UNIFIED SCHOOL DISTRICT,
ANNIE PETRIE, TROY MOTT, GERALD HARRIS
and JESUS MARTINEZ

Dated: October 18, 2017

BURNHAM BROWN

By: /s/ Gerald Carroll
Gerald K. Carroll
Attorneys for Defendants
J.T., JOHN TORRES and FLORA TORRES

Dated: October 18, 2017

TARKINGTON O'NEILL BARRACK & CHONG

By: /s/ Malcolm Barrack
Norman L. Chong
Malcolm E. Barrack
Attorneys for Defendant
R.J.

ATTORNEY ATTESTATION

I hereby attest that I have on file all holograph signatures for any signatures indicated by a conformed signature (“/s/”) within this E-filed document or have been authorized by plaintiff’s counsel to show their signature on this Stipulation as /s/.

Dated: October 18, 2017

By: /s/ Ethan Lowry
Ethan M. Lowry

October 19, 2017

